Memorandum on Completeness and Scope

File	FTAA-2610-1304
Application	Waikato Greenfield Racing Hub
To	Ben Bond, Team Leader LOA
From	[redacted]
Date	12 November 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Waikato Greenfield Racing Hub application, lodged by Waikato Thoroughbred Racing Incorporated (the Applicant), received by the Fast-track Team on 16 October 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. The Application was referred by the Minister for inclusion in the Fast-track consenting process under section 28 of the Act. The Minister accepted the referral application on 5 July 2026 and notified the EPA of the decision on the referral application on 6 July 2026.
5. The Application was lodged on 16 October 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive

application complies with section 46 of the Act by within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was subject to a further information request therefore the date by which the EPA must make a decision under 46 is 12 November.

6. As set out in more detail below, the EPA must decide whether the application is complete and either:
   - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
   - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

7. The referred project is a greenfield racing hub and commercial/residential development across approximately 164 hectares in the Waikato District.
8. The project includes:
   a. thoroughbred racing and associated activities, including:
      i. racing facility with a main track and 1200m starting chutes
      ii. facilities for race days, industry functions, and events
      iii. a thoroughbred training track
      iv. a warmup track v. on-site stables and yards for trainers' allotments
      v. a bloodstock office and sales business across approximately 63,200m2 with barns, yarding, sales pavilion and administration
      vi. an operations and events building across approximately 2,040m2 with a parade ring and tie up

   b. harness racing, including:
      i. a harness racing and training track
      ii. facilities for race days, industry functions and events
      iii. on site stables and yards for trainers' allotments

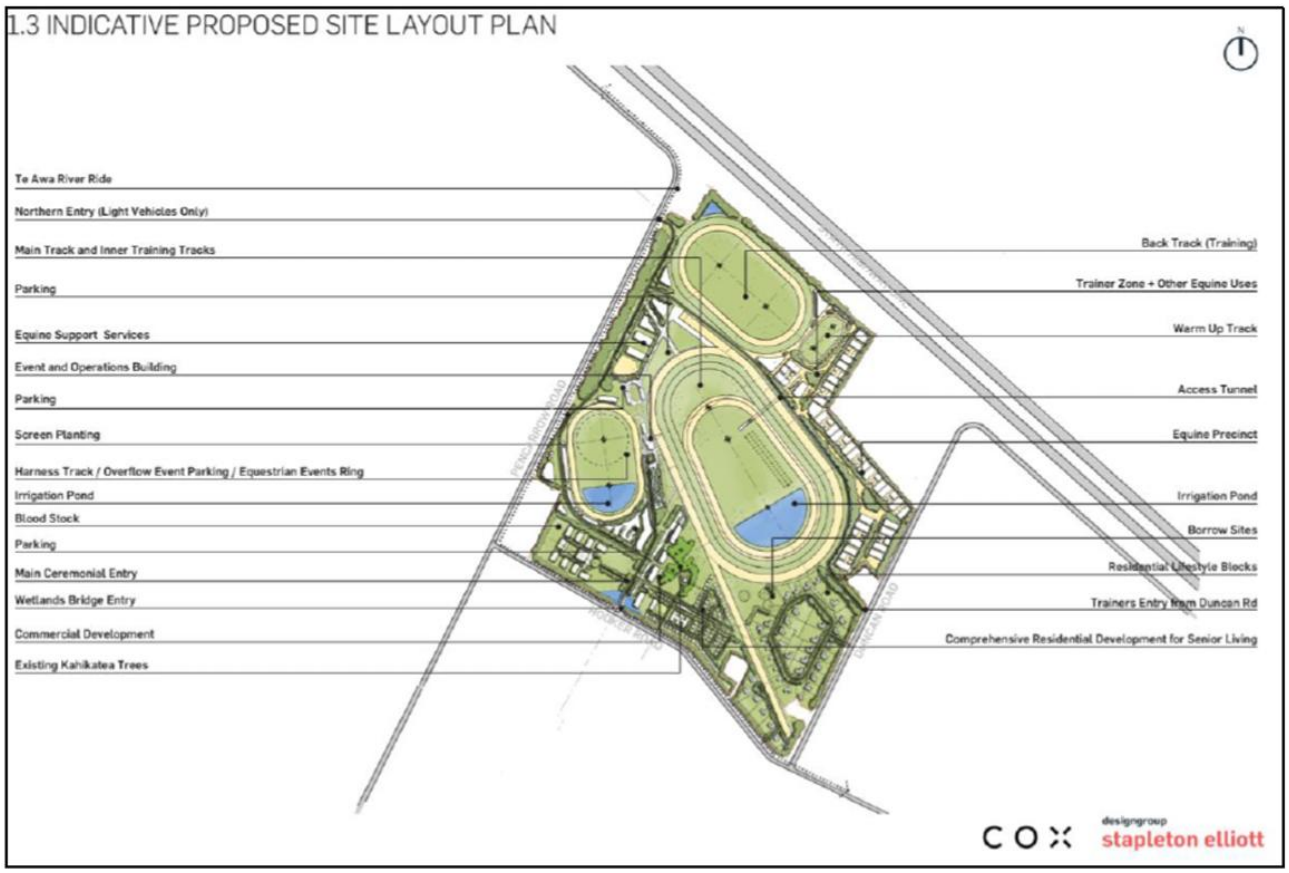
   c. other land uses, including:
      i. a retirement residential development with approximately 70-80 single storey villas, approximately 200 attached units and a community centre
      ii. a residential precinct with up to approximately 90 lots
      iii. an equestrian events ring
      iv. facilities to host temporary events
      v. a village centre including a bar, café and other small scale commercial activity

vi. parking areas for up to approximately 2,030 vehicles vii. commercial equine support services

vii. rehabilitation of the existing Kahikatea stand within the project site

viii. all associated infrastructure, construction, subdivision and earthworks including potential roading upgrades

9. The site layout that was provided as part of the referral application documents has been provided below



a. The referral project required the following approvals:

10. resource consents under the Resource Management Act 1991

i. approval under the Wildlife Act 1953

11. archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2013.

12. The substantive application is for the following activity:

a. Thoroughbred racing and training

i. Thoroughbred racing facility including a main track with 2,000m starting chute

ii. Race day functions and events (up to 60 race and trial meetings per year)
iii. 1800m thoroughbred training track • 500m warmup track
iv. Bush track
v. Trainers' allotments – on-site stables and yards for up to 900 horses on-site.
vi. Events building with parade ring and tie ups
vii. Administration building
viii. Industry functions and events to be held within the events building.
ix. Vet and farrier building at 3,800m2 gross floor area each
x. Provision to host certain temporary events not related to racing (conferences, awards events, industry training events etc)
xi. Parking areas for up to 2,310 vehicles (540 sealed, 1,770 overflow)
xii. Rehabilitation of the existing Kahikatea stand within the site
xiii. All associated infrastructure and earthworks on and off site.

b. Harness racing and training
   i. 1000m Harness racing and training track
   ii. Trainer's allotments – on site stables and yards
   iii. Raceday and industry functions and events (up to 50 race and trial meetings per year).

13. The substantive application for the project has gone through a number of changes since the referral stage.
    a. The applicant has outlined these within the substantive application:
       i. Re-orientation of the proposed racetracks in response to racing requirements.
       ii. The thoroughbred racing track has changed shape and is now located further north within the site.
       iii. The harness racing track has been re-oriented to run parallel with Pencarrow Road.
       iv. The thoroughbred training track is now located in the southern portion of the site.
       v. The property at 644 Pencarrow Road is no longer included.

    b. This subsequently has resulted in the following layout changes.
       i. Combining the equine commercial support and commercial development precinct and locating this entirely within the northwestern corner of the site - with the exception of two equine support buildings being relocated adjacent to the thoroughbred training complex.
       ii. Reducing the size of the main events building.
       iii. Locating the senior living precinct in the southwestern corner of the site.

iv. Locating the thoroughbred training facilities entirely within the northeastern corner of the site.

v. Amending the layout of the residential lifestyle block development to include 34 Lots rather than 90 as allowed for in the Referral Application.

vi. Changing the internal and external vehicle access, with the main change being the main entrances to the site now being located on Pencarrow Road.

14. The following changes have also occurred in relation to precinct areas as a consequence of the changes to the site layout.

    a. Subdivision

        i. A minor boundary relocation is proposed between Section 2 SO 547526 [RT 1027516] (which is part of the subject site) and Lot 2 DP 404891 [RT 417116] [101 Hooker Road] to amalgamate approximately 3,000 m2 of land with this property.

    b. Commercial Areas

        i. The commercial area was split into two areas 26,500m2 and 15,000m2 in size. The combined gross floor areas for these areas were 28,000m2. The latest Masterplan has resulted in a total area of 31,700m2 and gross floor area of 17,600m2 which has reduced from the Referral Application.

    c. Thoroughbred Training Complex

        i. The Referral Application Masterplan showed the training complex being located over an area of 150,000m2 with a gross floor area of 100,000m2. The Substantive Application masterplan has provided for a training complex over an area of 100,00m2 with a gross floor area of 32,600m2 While the areas have decreased, the number of horses stabled on site has not changed from the Referral Application.

    d. Senior Living Precinct

        i. The Referral Application allowed for approximately 70-80 single storey villas, approximately 200 attached units, and a community centre. The updated Masterplan has allowed for 90 villas, 40 units and a community centre with an associated 160 bed care facility. This is consistent with the scope of the referral application.

15. The updated Masterplan diagram of the project is provided below.

16. The changes to the substantive application plan resulted in the EPA requesting further information from the applicant, a record of this correspondence is included in **Appendix 3**



17. The application is still seeking approvals for
    a. Resource consents as an approval under section 42(4)(a)) that would otherwise be applied for under the RMA;
    b. An archaeological authority as an approval under section 42(4)(i)) that would otherwise be applied for under the HNZPTA.
18. Approval under the Wildlife Act 1953 is no longer being sought as further assessment undertaken by the applicant has concluded that the likelihood of lizard habitat being within the site is low and therefore a wildlife permit is not required and an accidental discovery protocol will be followed instead. This discovery protocol is outlined in the Lizard Management Plan attached to the application.

19. Following a review of the changes highlighted above, a Request for Information was issued to the applicant to clarify if some of the changes would be considered of specific interest was:
    a. Changes to the residential development capacity component
    b. Increase of starting chute size

20. The applicant response to the RFI provided clarity that:
    a. The senior living precinct remains a retirement residential development with the 160-bed care facility being a component of the retirement residential development.
    b. The references to a 1200m chute and a 2000m chute are to the location on the track where the chute is located, rather than to the length of the chute (ie a 1200m chute is the starting point for a 1200m race that finishes at the common finishing line, and a 2000m chute is similar for an overall 2000m race).
21. I have considered the applicant's explanation that the 160-bed care facility is a subset of the 200 attached units referenced in the section 28 notice sufficient to conclude that it still remains in scope of the proposed activity as described in the section 28 notice. Along with the clarification relating to the starting chute change relates to position, as opposed to a significant increase in size to a portion of the project.
22. Further information on the RFI is included in **Appendix 3**.

Fast-track consenting application process

Legislative context

23. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
    - complies with sections 42, 43 and 44;
    - relates solely to a listed project or a referred project;
    - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
    - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
24. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

25. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
26. This application has been lodged by Waikato Thoroughbred Racing Incorporated This person is an authorised person under the Act.

27. The approvals being sought are [list the approvals being sought (*delete those that do not apply*)].
    - an approval described in section 42(4)(a), (c) or (d) (resource consent, certificate of compliance or designation);
        - A resource consent, change to or cancellation of a resource consent: **checklist A**;
            - including subdivision or reclamation: **checklist A1**;
28. an approval described in section 42(4)(i) (archaeological authority), **checklist F**;
29. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

30. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at **Appendix 1**.

Section 44 Requirements

31. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at **Appendix 1**.
32. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in **Appendix 2**.
33. As set out in more detail in **Appendix 2**, the following agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.
    a. Waikato Regional Council
    b. Heritage New Zealand Pouhere
34. The following agencies consulted have advised that the information required by section 44 is provided in **insufficient** detail to satisfy the purpose for which it is required.
    a. Waikato District Council

Ineligibility

35. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
36. The list of ineligible projects includes activities:

- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
- on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
- in a customary marine or protected customary rights area without written agreement from the rights holder/group;
- within an aquaculture settlement area without the required authorisation;
- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
- That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
- That are undertaken for the purposes of an offshore renewable energy project.

37. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

38. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
    - Application fee in the sum of $250,000 plus GST;
    - Levy in the sum of $140,000 plus GST; and

Consultation

39. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
    - Waikato Regional and District Council for:
        i. an approval described in section 42(4)(a) (resource consent)
        ii. an approval described in section 42(4)(b) (change or cancellation of resource consent condition)
    - Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority);
40. A summary of the consultation is included as Appendix 2.

Requests for further information

41. I requested further information from the applicant under section 46(2A) on 3 November 2026 in relation to:
    - Scope of the substantive application against the section 28 notice specifically on:
        - Residential development component
        - Starting chute size
    - Requirements against Schedule 5 of the Act
        - Clause 5(1)(b)
    - Operational stormwater management and design (as outlined by Waikato District Council in their response to the applicant)
42. The applicant responded with the information on 9 November 2026 within the 20- working timeframe afforded by section 46(2B). A full copy of the request and response can be found in **Appendix 3.**

Assessment of compliance for each section of each application form

43. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in **Appendix 1** for ease of reference.
44. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
45. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
46. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	**Refer to Section 5 of the Planning Assessment Pages 23 -62**	Addressed as referenced
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	**Refer to Section 4, 6 and 15 of the Planning Assessment**	Site map provided as part of Section 4 The initial application documents did not outline in enough detail about if the project site is within or adjacent to statutory areas, following the applicant's response to a RFI 3 November 2026 (section 3), I consider the applicant's has met the completeness check requirements relating to clause 5(1)(b) of the Act.

5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	**Refer to Section 6, 10 and 11 of the Planning Assessment - Pages 62 - 64, 69 - 77, 87- 90. We can confirm that fees and levys payable have been paid.**	Addressed as referenced
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	**Refer to Appendix M of the Application**	Refer to Appendix M

5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	**Refer to Section 8 of the Planning Assessment - Page 74**	Applicant has identified no there are no other activities that form part of the proposal to which this consent application relates.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	**Refer to Section 8 of the Planning Assessment - Page 74**	Refer to page 78 - 82 Applicant has confirmed that the Application seeks all required consents for project
5(1)(g)	An assessment of the activity against sections 5, 6 and 7of the Resource Management Act 1991	**Refer to Section 6 of the Planning Assessment - Pages 63 - 64**	Refer to pages 63 -64
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement:	**Refer to Section 14 of the Planning Assessment - Pages 111 - 123**	Addressed, refer to pages 111 - 123

	• a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.		
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	**Refer to Section 15 of the Planning Assessment - Pages ǵ - 125**	Addressed, as referenced
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an	**Refer to Section 15 of the**	Addressed, as referenced

	application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	**Planning Assessment - Page 125**	
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	**Refer to Section 16 of the Planning Assessment - Page 126. Also refer to Appendix T.**	Addressed, Section 8, Section 16 and Appendix TA-TI
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	**Refer to the Consultation summary attached as Appendix D.**	Addressed, Appendix D Pg 26-pg 29
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	**Refer to Section 13 of the Planning Assessment (Pages 92 - 111)**	Addressed, as referenced

		and the relevant technical reports	
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	**Refer to Section 13 of the Planning Assessment (Pages 92 - 111) and the relevant technical reports**	Addressed, as referenced
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and	**Refer to Section 13 of the Planning Assessment (Pages 92 - 111) and the relevant technical reports**	Addressed, as referenced

	(ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters:	**Refer to Section 13 of the Planning**	Initial application documents addressed all points to the required level, with the exception of discharges

	(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	**Assessment (Pages 92 - 111) and the relevant technical reports**	relating to Stormwater. Waikato District Council raised questions in relation to the operational stormwater management and design. This was put to the applicant in the RFI dated 3 November 2026. Following the applicant response I considered they have provided sufficient information to meet the requirements of s 46.
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource	**Refer to Section 9 of the Planning Assessment (Pages 80, 82, 84 and 85)**	**Addressed (Pages 80, 82, 84,85 and 86)**

	consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)		
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	**The activity does not occur within this area.**	N/A
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	**The activity does not occur within a taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996**	N/A

CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference	EPA
If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below. If no subdivision consent is sought, please enter n/a.			
8(1)(a)	The position of all new boundaries	**Refer to Section 5.1 of the Planning Assessment (Pages 25-29) and the Scheme Plans attached as Appendix NA**	Boundaries described in pages 25-29 of the Planning assessment. Diagrams provided in Appendix NA
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	**Refer to Section 5.1 of the Planning Assessment (Pages 25-29) and the Scheme**	Addressed as referenced

		Plans attached as Appendix NA	
8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	**N/A**	Following the applicant's response to a RFI dated 3 November 2026 (section 5), I believe that the application has met the standard for s 46
8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	**N/A**	Following the applicant's response to a RFI dated 3 November 2026 (section 5), I believe that the application has met the standard for s 46
8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	**N/A**	
8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	**N/A**	
8(1)(g)	The locations and areas of land to be set aside as new roads	**Refer to Section 5.1 of the Planning Assessment (Pages 25-29) and**	Boundaries described in pages 25-29 of the Planning assessment. Diagrams provided in Appendix NA

		the Scheme Plans attached as Appendix NA	
If this application is for a reclamation consent, please include the information to show the area to be reclaimed set out in clause 8(2) below. If no reclamation consent is sought, please enter n/a.			
8(2)(a)	The location of the area to be reclaimed	**N/A**	
8(2)(b)	If practicable, the position of all new boundaries	**N/A**	
8(2)(c)	Any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip	**N/A**	

CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	**Refer to Sections 4, 7 and 8 (Pages 15 - 23, 67- 69 and 74)**	Legal descriptions of subject site and further descriptions of the land provided within section 4 of the Combined Planning Assessment document.

2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	**Refer to Section 4 of the Planning Assessment - Page 16.**	Names of the owners of the relavent land provided within Section 4 of the Combined Planning Assessment document.
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	**The applicant will be the land owner**	Proof provided within property titles provided as Appendix E of application documentation.
2(1)(d)	confirmation that the application complies with section 42, 43, and 44 of the Act	**Refer to Section 7 of the Planning Assessment - Pages 67-69**	Addressed
	confirmation that the application relates solely to a listed project or a referred project	**Refer to Section 10 of the Planning Assessment - Page 87**	Addressed
	any fee, charge, or levy payable under regulations in respect of the application is paid.	**We can confirm that fees and levys payable have been paid.**	Fees and Levy paid to EPA.
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	**Refer to Section 4 of the Planning**	A description of the Archaelogical site is provided within section 4 of

		Assessment (Page 23)	the Planning Assessment document, and generally within Appendix L: Archaeological Assessment document.
2(1)(f)	a description of the activity for which the authority is sought	**Refer to Section 7 (Pages 67-69) of the Planning Assessment and the Archaeological Assessment attached as Appendix L.**	A description of the Archaelogical site is provided within section 4 of the Planning Assessment document, and generally within Appendix L: Archaeological Assessment document.
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	**Refer to Section 13 (Page 105) of the Planning Assessment and the Archaeological Assessment attached as Appendix L.**	Effects on Archaeological Values
2(1)(h)	except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of—	**Refer to Section 13 (Page 105) of the Planning Assessment and the**	Addressed as referenced

	(i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values	**Archaeological Assessment attached as Appendix L.**	
2(1)(i)	a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected— (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or (ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).	**Refer to the Consultation Summary Attached as Appendix D.**	Addressed as referenced

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Waikato District Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

    - Resource consent (section 42(4)(a) of the Act)
    - Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

    Dear [redacted]

    Application number(s):FTAA-2610-1304

    Applicant: Waikato Thoroughbred Racing Incorporated

    Address: Pencarrow Road, Duncan Road, and Hooker Road

    Proposal: The creation of a Waikato Greenfield Racing Hub that includes horse training, racing and associated equine activities, including equine support services and bloodstock sales. In addition, rural-residential development, a senior living community, and village centre are also proposed.

    Thank you for the opportunity to provide comments on the completeness of the Waikato Greenfield Racing Hub substantive application under section 46 of the Fast-track Approvals Act 2024 (FTAA).

    For this completeness check, the relevant local water entity, IAWAI, contributed to the reviews (attachment 1) undertaken by Waikato District Council (Council).

    COMPLETENESS ASSESSMENT - SECTIONS 42, 43 AND 44

    Council has assessed the substantive application against sections 42, 43 and 44 of the Fast-track Approvals Act 2024, focusing on the approvals sought and the matters relevant to Council's functions and responsibilities as a territorial authority.

    Section 42 and Section 43

    Council considers that the application generally addresses the matters required by sections 42 and 43 of the Act. The application contains a description of the proposed development, an assessment of the activity's effects on the environment, supporting technical assessments, and the information necessary to identify and have a general understanding of the proposal and the approvals sought.

    Section 44 –

Sufficiency of Detail Council are committed to working with the applicant however

Council considers that not all the relevant information necessary for a completeness assessment has been provided. Please refer to the section 3.5.2 of the letter from IAWAI (Attachment 1), and the deficiencies in the information submitted in support of the stormwater design. For the reasons as outlined in section 3.5.2 of the letter it is recommended that more detailed stormwater information is sought prior to the application as being accepted as complete.

In addition, it is considered that further information and technical clarification will be required as part of the evaluation process as outlined below. Please note that Council do not consider it is crucial that the matters outlined below need to be addressed prior to the application being accepted.

- *The planning assessment focuses on the development of the racing related facilities and further details on the rural-residential subdivision and senior living facility would be useful. For example, section 8 of the Planning Assessment refers to the consent duration, construction and staging of the 'The Hub' however there are no similar details in relation to the rural residential subdivision and the senior living facility.*
- *The cross referencing in the planning assessment to consent conditions do not appear to correlate in all circumstances, and it is not clear at times what suite of conditions is being referenced. The condition numbering also needs checking for accuracy and as an example refer to Appendix TC. It is recommended that an updated planning assessment addressing these errors is provided given the extensive conditions and their presentation in separate appendices.*
- *The application notes that proposed Lot 7 to be created will be amalgamated with the property at 101 Hooker Road requiring consent for a boundary adjustment. It is acknowledged that the precinct activities will not be occurring on 101 Hooker Road but given that consent appears to be required for a boundary adjustment with this property the Record of Title details should be provided as the site forms part of the application.*
- *The application details include a concept design for the lighting but there does not appear to be any assessment of lighting effects, including but not limited to an assessment against the relevant lighting rules and standards of the Waikato District Plan – Operative in Part.*
- *Further assessment is required within the draft Construction Traffic Management Plan to assess the potential impacts of construction traffic movements on the existing road network and to identify appropriate mitigation measures where necessary.*
- *Although the construction phasing has been outlined in Section 8 of the Assessment of Environmental Effects, detailed earthworks staging information has not been provided. In the absence of this information, it is not possible to adequately assess the traffic effects*

associated with earthworks activities during the construction phase, including construction vehicle movements and their impact on the surrounding road network.

- *The proposed earthworks stages need to be identified and clearly labelled on the Earthworks Plans.*
- *An assessment as required by section 106 of the RMA, including a risk assessment matrix addressing potential natural hazards and the implications for the proposed development.*
- *In terms of transportation effects, as a minimum, further information on the following matters is considered necessary:*
    - *o Confirmation of how many parking spaces will be provided onsite and an assessment of likely parking demand for each activity occurring to confirm that the proposal does not result in offsite parking effects.*
    - *A detailed safety assessment of the surrounding intersections (e.g. the Hooker Road/Cambridge Road intersection) and whether further mitigation is required to minimise safety effects at the intersections.*
    - *Sensitivity testing of trip distribution assumptions.*

SUMMARY In Waikato District Council's view, the application does not contain sufficient information in terms of stormwater management to be considered complete for the purposes of the Environmental Protection Authorities completeness assessment. Whilst not a matter for the completeness check, Waikato District Council questions whether the 160-bed care facility falls within the scope of the referral application and introduces a new activity with associated effects, particularly traffic generated by deliveries, staff and visitors.

2. **Consultation with Waikato Regional Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

   - Resource consent (section 42(4)(a) of the Act)
   - Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

   Hello [redacted]

   Re: Consultation regarding a substantive application under the Fast-track Approvals Act 2024

   Thank you for your letter dated 21 October 2026 to the Waikato Regional Council (WRC) regarding the Waikato Greenfield Racing Hub application lodged under the Fast-Track Approval Act (the Act).

   Your letter has requested the WRC provide a written response to the following matters:

   - *whether the written notice under section 30(3)(b)/30(5), dated 12 August 2026, prepared by Waikato Regional Council remains accurate and final at the time of receiving this letter.*
   - *whether any relevant matters listed in clauses 5 to 9 of Schedule 5 (information required in resource consent application) have not been addressed or have not been provided in sufficient detail.*

   I advise that the written notice under section 30(3)(b)/30(5), dated 12 August 2026, prepared by Waikato Regional Council remains accurate as of the date of this letter.

   WRC also confirms that there are no relevant matters within the Waikato Regional Council's purview listed in clauses 5 to 9 of Schedule 5 (information required in resource consent application) that have not been addressed or have not been provided in sufficient detail.

   Overall, WRC considers the application meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail for the matters of relevance to the WRC to satisfy the purpose for which it is required, in accordance with section 44 of the Act.

   If you require further information on these matters, please contact Hugh Keane in the first instance.

3. **Consultation with the Heritage New Zealand Pouhere Taonga** as the administering agency for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 (section 42(4)(i)).

Introduction

1. *On 19 October 2026, Waikato Thoroughbred Racing Incorporated (the Applicant) lodged a substantive application for Waikato Greenfield Racing Hub (the Project) with the Environmental Protection Agency (EPA).*
2. *On 20 October 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.*
3. *HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.*

Completeness Check

4. *HNZPT confirms that all documentation has been provided that is required for an archaeological authority application.*

Competing Interests Check

5. *HNZPT confirms that there are no current competing archaeological authority applications under the Heritage New Zealand Pouhere Taonga 2014 Act that relate to the same activity and site.*

Appendix 3: Further information requests and responses

I sent one further information requests to the applicant during under section 46(2B) of the Act. The request and response are set out below.

Request for Further Information 1:

- Date sent: 3 November 2026
- Topics:
    - Scope of the substantive application against the section 28 notice relating to
        - Residential development component
        - Starting chute size
    - Requirements against Schedule 5 of the Act
        - Clause 5(1)(b)
    - Operational stormwater management and design (as outlined by Waikato District Council in their response to the applicant)
- Date of response: 9 November 2026

Request:

Fast-track

New Zealand Government
Te Kāwanatanga o Aotearoa

FTAA-2610-1304

3 November 2026

Waikato Thoroughbred Racing Incorporated
c/- Josh Caddigan
Email: [redacted]

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, Waikato Greenfield Racing Hub (the application), under the Fast-track Approvals Act 2024 (the Act) on 16 October 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To assist us in assessing if the application complies with Section 46(2) of the Act, please provide a response to the following matters:

Scope

The project description included as part of the substantive application documents notes changes to the project site from the description that was approved in the Section 28 notice. The application notes:

> "These changes represent refinements to internal layouts and allocation of space and do not materially increase the footprint, scale, intensity or environmental effects of the Hub outside of what could be considered within general accordance."

Further information is required for the EPA to determine if this application meets the requirements of Section 46(2) of the Act.

1. **Residential development component**

The referral Section 28 describes 200 attached units, while the substantive application proposes a 160-bed care facility and 40 units.

Request:

Please provide a detailed assessment comparing the referred application proposal (as approved in the Section 28 notice) and substantive proposals, specifically whether the changes alter the character, scale, or nature of the development. The assessment should clearly identify differences in the land use mix, built form, operational outcomes, and development intensity, including a comparison of gross floor area, overall building dimensions, building height, footprint, site coverage, and any other relevant design parameters.

2. **Starting chute size**

The Section 28 notice proposes a 1,200m starting chute, which aligns with the referral application. The substantive application proposes a 2,000m starting chute.

Request:

Please provide a detailed assessment comparing the referred application proposal (as approved in the Section 28 notice) and substantive proposals, specifically whether the changes alter the character, scale, or nature of the development. The assessment should clearly identify differences in the built form, overall area, site coverage, and any other relevant design parameters.

Schedule 5 of the Act

3. **Clause 5(1)(b)**

Request:

To meet the requirements of Clause 5(1)(b) of Schedule 5 of the Act, please provide confirmation as to whether the project site is adjacent to:

(i) a statutory area (as defined in the relevant Treaty settlement Act); or

(ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).

4. **Consultation feedback from Waikato District Council**

The following requests were raised as part of the mandatory consultation the EPA undertook with the Waikato District Council (WDC). Please see the attached WDC letter provided as Appendix A. In summary, WDC considered that the information submitted in relation to operational stormwater management and design was insufficient.

Request:

To assist us in assessing if this application complies with clause 5(4)b and clause 7 under Schedule 5 of the Act, can you please provide:

- An assessment of the overall Waikato District Council and Waikato Regional Council stormwater management requirements. This should:

  (A) set the design parameters for water quality, volume mitigation, primary capacity and secondary system performance. With reference to (at a minimum) the Regional Infrastructure Technical Specification (RITS) and the Waikato Stormwater Management Guideline.

  (B) It should also identify which performance measures are achieved at source and which are achieved through centralised infrastructure.

- The inclusion of a complete concept design within the Flood Assessment Report, that demonstrates how effects will be mitigated as part of the consent.
- Water quality calculations to show the level of treatment provided by the swales.
- Stormwater volume mitigation calculations to demonstrate how sufficient stormwater attenuation is provided.

5. Clause 8(1)(c) and Clause 8(1)(d)

Within the application checklist, you have responded N/A to Clause 8(1)(c) and Clause 8(1)(d) of Schedule 5 of the Act.

Request:

Please provide further information as to why these clauses are not applicable to your application.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 1 December 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 1 December 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact Mujahid Musa, Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā



Ben Bond

Team Leader, Fast-track Applications

Response:

9 November 2026

Environmental Protection Authority

Attn: Ben Bond

Delivered via email: projects@fasttrack.govt.nz

RE: FTAA-2610-1304 – Waikato Greenfield Racing Hub

Thank you for your letter dated 3 November 2026 outlining a request for further information with regard to the abovementioned Fast Track Substantive Application.

We provide responses to your queries as follows:

Scope

1. Residential development component

The referral Section 28 describes 200 attached units, while the substantive application proposes a 160-bed care facility and 40 units.

Request:

Please provide a detailed assessment comparing the referred application proposal (as approved in the Section 28 notice) and substantive proposals, specifically whether the changes alter the character, scale, or nature of the development. The assessment should clearly identify differences in the land use mix, built form, operational outcomes, and development intensity, including a comparison of gross floor area, overall building dimensions, building height, footprint, site coverage, and any other relevant design parameters.

Response:

The senior living precinct was described as both a "comprehensive retirement residential development" and a "comprehensive retirement living precinct in both the referral and substantive application. It was the intention of the applicant that the "comprehensive" nature of this proposal was inclusive of a continuum of care options for senior residents as opposed to a lifestyle village that would not include a care facility. The inclusion of a care facility within the substantive application is in line with the comprehensive nature of the retirement development that was proposed at referral stage.

The full wording of the Referral Decision states:

a) other land uses, including:
   i) a retirement residential development with approximately 70-80 single storey villas, approximately 200 attached units and a community centre

The senior living precinct remains a retirement residential development with the 160-bed care facility being a component of the retirement residential development. This is consistent with the referral decision which refers to approximately 200 attached units. The 160-bed care facility is considered to be a type of retirement unit which falls within the '200 attached unit' description.

The complete built form of the comprehensive senior living precinct was not specified at referral stage, with the master plans identifying development density, gross floor areas and maximum number of storeys only. The proposed built form is consistent with the development density, gross floor area and maximum number of storeys that was proposed as part of the referral application which is described below.

The added detail in the description of the comprehensive senior living precinct to specify a 160-bed aged care facility does not materially change the land use mix, operational outcome or development intensity of the senior living precinct as approved in the referral decision.

It will result in a lesser level of environmental effect particularly on the transport network than if the 200 apartments proposed consisted of purely "lifestyle" apartments rather than care suites as the occupants of these care suites are not typically mobile enough to be leaving the site each day or operating independently.

For clarity, a detailed breakdown of proposed floor areas and development density for both the referral and substantive application is provided in **Table 1** below.

Table 1: Breakdown of gross floor areas proposed at referral and substantive stage.

Referral Application	Substantive Application
Development Density: Villas	
70 -80 single storey detached villas with an average gross floor area (GFA) of 100m² this is a GFA of approximately 7,000m²	90 single storey detached villas are proposed with an average gross floor area (GFA) of 100m² This is a total GFA of approximately 9,000m². This is an increase of 10 detached villas from the "approximate" numbers provided with the referral application and is considered to be in 'general accordance' with the number of villas proposed at referral stage. A maximum of 90 villas has been secured by the conditions of consent in Appendix TC of the application. These conditions allow for no further increase to the number of villas proposed as part of the substantive application, including the general accordance increase allowed for in consent decisions. In regard to environmental effects, the increase in villas will not result in additional adverse environmental effects. As discussed above, while the number of villas has increased, the added detail in the description of the comprehensive senior living precinct to specify a 160-bed aged care facility results in a lesser level of environmental effect than originally described, particularly on the transport network as the occupants of these care suites are not typically mobile enough to be leaving the site each day or operating independently. On this basis, the added detail regarding the aged care beds ensures that the additional 10 villas proposed do not result in additional adverse environmental effects as this is off set by the reduction in independent living options available within the senior living precinct.
Development Density: Apartments	
200 attached apartments / units with an average GFA of 50m². This equals a total GFA of	40 attached apartments / units with an average GFA of 50m² and 160 care suites at an average of 25m² each. Therefore, the number of overall units (200) combined across the aged care and apartments remains the same as applied for in the referral application. In regard to GFA, this equals a total GFA of 2,000m² of apartments and 4,000m² of aged care units (total overall of 6,000m²) across a maximum of two storeys. With the clarification to the activity description to include the care units , this is less GFA than was originally proposed in the referral application, which allowed for a GFA of 10,000m² across the apartment aspect of the proposal.

10,000m² with a maximum of two storeys.	Therefore, the development will have a lesser level of built form as proposed, reducing building coverage and retaining further open space within the site. The reduced gross floor area does not result in any increase to traffic movements or the overall density of the development as originally proposed at referral stage, and which the environmental effects have been thoroughly assessed as part of the substantive application.
Development Density: Community Centre	
A maximum two storey building with a GFA of 500m² per floor.	A single storey building with a GFA of 1,050m². This is a slight overall GFA increase of 50m². Reducing this building to a single storey reduces the profile of the building and limits views of this building from neighboring properties above what was originally proposed. The overall use of the building and the floor area remains generally unchanged from the referral stage, and the amendment does not change or increase the level of effects from this building.
Overall GFA at Referral:	**Overall GFA in Substantive Application:**
17,500m²	16,050m². This is a minor reduction in the total GFA compared to what was proposed at referral stage.

Summary

As detailed in the above breakdown, while the senior living precinct description has been updated to further refine proposal consistent with the further detailed design work, this update does not materially change the land use mix, operational outcome or development intensity of the senior living precinct, and the proposed development results in a slight decrease in GFA from what was applied for at referral application stage.

Therefore, it is considered that the refinement to the senior living precinct description does not alter the character, scale, or nature of the development and the development therefore remains within scope.

2. Starting chute size

The Section 28 notice proposes a 1,200m starting chute, which aligns with the referral application.

The substantive application proposes a 2,000m starting chute.

Request:

Please provide a detailed assessment comparing the referred application proposal (as approved in the Section 28 notice) and substantive proposals, specifically whether the changes alter the character, scale, or nature of the development. The assessment should clearly identify differences in the built form, overall area, site coverage, and any other relevant design parameters.

Response:

The Referral Decision states:

The project includes:

a) thoroughbred racing and associated activities, including:
    i) a racing facility with a main track and 1200m starting chutes

As an initial clarification, the references to a 1200m chute and a 2000m chute are to the location on the track where the chute is located, rather than to the length of the chute (ie a 1200m chute is the starting point for a 1200m race that finishes at the common finishing line, and a 2000m chute is similar for an overall 2000m race). In other words, the only difference between a 1200m chute and a 2000m chute is where on the track they are located.

Sheet 1.3 of the masterplan provided at referral application included 2 starting chutes (although not labelled) which were at 1200m and 2000m. Both chutes were contemplated in the referral application, and both have been carried through into the substantive application design.

The reference to a 2,000m starting chute does not alter the character, scale or nature of the development, as the purpose of the track remains the same and the track has not increased in overall length from what was proposed at referral stage.

The track therefore remains within scope.

3. Clause 5(1)(b)

Request:

To meet the requirements of Clause 5(1)(b) of Schedule 5 of the Act, please provide confirmation as to whether the project site is adjacent to:

(i) a statutory area (as defined in the relevant Treaty settlement Act); or

(ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).

Response:

As described in the provided legal considerations letter and section 15 of the Planning Assessment, there are several Treaty settlements relevant to the project area, including the Waikato-Tainui Raupatu Claims Settlement Act 1995, the Waikato Raupatu Claims (Waikato River) Settlement Act 2010, the Ngaati Hauaa Claims Settlement Act 2014 and the Raukawa Claims Settlement Act 2014. These were identified in the section 18 Report for the Project.

While the site is located within the 1995 treaty settlement catchment area of interest, there are no statutory acknowledgement areas in the 1995 Settlement Act, and the site does not include any land subject to this settlement

While the site is located within the catchment of the Waikato River, the application is not for an activity related to the Waikato River, and the proposal is not considered to affect the health and wellbeing of the Waikato River.

The site does not adjoin any statutory areas identified in the Ngaati Hauaa Claims Settlement Act 2014 or the Raukawa Claims Settlement Act 2014

The site is not located within any area identified in any part of schedule 2 of the Ngaa Rohe Moana o Ngaa Hapuu o Ngaati Porou Act 2019 and is not within any customary marine Title area identified in Section 11 of this act.

The site is not identified on the map within Schedule 3 of the Ngaa Rohe Moana o Ngaa Hapuu o Ngaati Porou Act 2019.

4. Consultation feedback from Waikato District Council

The following requests were raised as part of the mandatory consultation the EPA undertook with the Waikato District Council (WDC). Please see the attached WDC letter provided as Appendix A.

In summary, WDC considered that the information submitted in relation to operational stormwater management and design was insufficient.

Request:

To assist us in assessing if this application complies with clause 5(4)b and clause 7 under Schedule 5 of the Act, can you please provide:

- *An assessment of the overall Waikato District Council and Waikato Regional Council stormwater management requirements. This should:*

  a) *set the design parameters for water quality, volume mitigation, primary capacity and secondary system performance. With reference to (at a minimum) the Regional Infrastructure Technical Specification (RITS) and the Waikato Stormwater Management Guideline.*
  b) *It should also identify which performance measures are achieved at source and which are achieved through centralised infrastructure.*

Response:

An assessment of the WDC (RITS) and WRC requirements is provided in the Civil and Stormwater Report (Section 6.1 – Table 6)

The assessment is as per RITS V2 Stormwater (Table 48) & WRC TR2020/07 and includes a Low Impact Design Scoring Matrix.

A Stormwater Management Plan has been prepared as (**Sheet reference C-690**) to provide additional information in relation to the above assessment.

- *The inclusion of a complete concept design within the Flood Assessment Report, that demonstrates how effects will be mitigated as part of the consent.*

Response:

A range of flood mitigation options were provided in the Flood Report to give the designer options during the detailed design phase post-consent. We have, however, now updated the report (Section 5 of the BCD Floor Assessment Report) to outline the mitigation expected to be adopted as part of the engineering design phase.

- *Water quality calculations to show the level of treatment provided by the swales.*

Response:

Refer to the assessment provided as per **Section 6.2** of the Civil and Stormwater Report.

Swale calculations have been provided (appended Civil & Stormwater Report; **Appendix B**) showing the residence time achieved.

Although we do not expect groundwater to adversely affect swale flow or impact overall design, groundwater will be addressed in detailed design with surface modelling (if required), the swale could be widened and channel depth lifted once detailed 3D modelling was undertaken.

- *Stormwater volume mitigation calculations to demonstrate how sufficient stormwater attenuation is provided.*

Response:

GEOHEC-RAS modelling has been provided showing attenuation volumes.

Additional calculations have been provided showing attenuation of all post developed run off can be accommodated by the ponds. These have been appended to the Civil and Stormwater Report; **Appendix B**.

As mentioned above, the following documents have been updated to reflect the above comments:

- New civil drawing showing stormwater management including treatment (Appendix A of this letter)
- Civil and Stormwater Report (**Appendix B** of this letter)
- Flood Modelling Report (**Appendix C** of this letter)

5. Clause 8(1)(c) and Clause 8(1)(d)

Within the application checklist, you have responded N/A to Clause 8(1)(c) and Clause 8(1)(d) of Schedule 5 of the Act.

Request:

Please provide further information as to why these clauses are not applicable to your application.

Response:

Clause 8(1)(c) of the FTAA applies to defining the location of new reserves to be created, including any esplanade reserves and strips.

Clause 8(1)(d) of the FTAA applies to defining the location of existing esplanade reserves, strips and access strips.

The proposed subdivisions do not propose any new reserves or esplanade reserves or strips. Therefore Clause 8(1)(c) is not applicable to the application.

There are no existing esplanade reserves or esplanade / access strips within the subject site, therefore there is nothing to define in the application under these clauses.

Conclusion

I trust this response satisfies your further information requirements in relation to the completeness-check further information request and the application can be accepted as complete.

Please do not hesitate to contact me should you have any questions on [redacted]

Kind regards,



Josh Caddigan
Senior Planner
BCD Group